Law Office of FELIX Q. VINLUAN

69-10 Roosevelt Avenue, 2nd Floor, Woodside, NY 11377 t 718.478.4488 f 718.478.4588 fgyinluan@yahoo.com

June 18, 2020

Chief Magistrate Judge Cheryl L. Pollak Eastern District Court of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: Moskalenko v. Carnival PLC et al., Case No. 17-cv-06947 (NGG-CLP)

Dear Magistrate Judge Pollak:

The parties, on consent, through undersigned plaintiff's counsel, submit this joint status report pursuant to your Electronic Status Report Order dated May 26, 2020. Due to inadvertence, we did not realize we had to submit this report last June 10, 2020, and we apologize.

After we submitted the Status Report dated March 5, 2020, Plaintiff's counsel was able to communicate with Ms. Moskalenko who informed him that she had discussed with a local lawyer in Bermuda to represent her in the arbitration proceedings to be filed in Bermuda, pursuant to the Court's Order. Unfortunately, before Ms. Moskalenko was able to make any travel arrangements, the World Health Organization declared a world-wide pandemic due to the Covid-19 corona virus, and she was unable to leave her country, Ukraine. Plaintiff's counsel has just been informed by Ms. Moskalenko that she could still not leave her country, and that Bermuda has just reopened "moving to normal" very recently.

Ms. Moskalenko begs the Court's understanding why she can not to this time file yet her arbitration proceedings in Bermuda as the Court had ordered.

We thank the Court for your time and consideration in this matter.

Very truly yours,

s/ Felix Q. Vinluan
Counsel for the Plaintiff

Edgar R. Nield, Esq. (*via ECF and email*)
Counsel for the Defendants

cc: